

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS and VERIZON CORPORATE  
SERVICES GROUP, INC.,

*Defendants.*

Case No. 2:23-CV-00352-JRG-RSP

**JOINT REPORT OF MEET AND CONFER REGARDING VERIZON'S MOTIONS TO  
COMPEL (DKT. NOS. 122, 123)**

Pursuant to Paragraph 9(c) of the Court's Discovery Order (Dkt. No. 39), Local Rules CV 7(h) and (i), and the Court's Standing Order Regarding "Meet and Confer" Obligations Relating to Discovery Disputes, Plaintiff Headwater Research, LLC ("Headwater") and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, "Verizon" or "Defendants"), (collectively, the "Parties") respectfully file this Joint Report about the results of their lead/local meet and confer on the two motions set for hearing on February 5, 2025: Verizon's Motion to Compel Corporate Document Productions (Dkt. No. 122) and Verizon's Motion to Compel Expert Reports, Transcripts, Exhibits, Written Discovery, and ESI (Dkt. No. 123).

While the Parties discussed their respective positions, they were unable to resolve the matters set forth in their briefing on Verizon's Motions to Compel and presently remain at

impasse on each motion. If there are any developments between now and the hearing date, the Parties will update the Court.

Dated: January 28, 2025

*/s/ Marc Fenster*

Marc Fenster  
CA State Bar No. 181067  
Email: mfenster@raklaw.com  
Reza Mirzaie  
CA State Bar No. 246953  
Email: rmirzaie@raklaw.com  
Brian Ledahl  
CA State Bar No. 186579  
Email: bledahl@raklaw.com  
Ben Wang  
CA State Bar No. 228712  
Email: bwang@raklaw.com  
Adam Hoffman  
CA State Bar No. 218740  
Email: ahoffman@raklaw.com  
Dale Chang  
CA State Bar No. 248657  
Email: dchang@raklaw.com  
Paul Kroeger  
CA State Bar No. 229074  
Email: pkroeger@raklaw.com  
Neil A. Rubin  
CA State Bar No. 250761  
Email: nrubin@raklaw.com  
Kristopher Davis  
CA State Bar No. 329627  
Email: kdavis@raklaw.com  
James S. Tsuei  
CA State Bar No. 285530  
Email: jtsuei@raklaw.com  
Philip Wang  
CA State Bar No. 262239  
Email: pwang@raklaw.com  
Amy Hayden  
CA State Bar No. 287026  
Email: ahayden@raklaw.com  
Ryan Lundquist  
CO State Bar No. 56449  
Email: rlundquist@raklaw.com  
Jason M. Wietholter  
CA State Bar No. 337139  
Email: jwietholter@raklaw.com  
Qi (Peter) Tong

*/s/ Katherine Q. Dominguez*

Katherine Q. Dominguez (Lead Attorney)  
kdominguez@gibsondunn.com  
Josh A. Krevitt  
jkrevitt@gibsondunn.com  
Brian Rosenthal  
brosenthal@gibsondunn.com  
**GIBSON, DUNN & CRUTCHER LLP**  
200 Park Avenue  
New York, New York 10166-0193  
Telephone: (212) 351-4000  
Facsimile: (212) 351-4015

Robert Vincent  
rvincent@gibsondunn.com  
**GIBSON, DUNN & CRUTCHER LLP**  
2001 Ross Avenue, Suite 2100  
Dallas, Texas 75201-2923  
Telephone: (214) 698-3100  
Facsimile: (214) 571-2900

Andrew Robb  
arobb@gibsondunn.com  
**GIBSON, DUNN & CRUTCHER LLP**  
1881 Page Mill Road  
Palo Alto, CA 94304  
Telephone: (650) 849-5334

Deron R. Dacus (TX Bar No. 00790553)  
**THE DACUS FIRM, P.C.**  
821 ESE Loop 323, Suite 430  
Tyler, Texas 75701  
Telephone: (903) 705-1117  
Email: ddacus@dacusfirm.com

**ATTORNEYS FOR DEFENDANTS**

TX State Bar No. 24119042  
Email: ptong@raklaw.com  
**RUSS AUGUST & KABAT**  
12424 Wilshire Blvd., 12th Floor  
Los Angeles, CA 90025  
Telephone: 310-826-7474

Andrea L. Fair  
TX State No. 24078488  
**MILLER FAIR HENRY PLLC**  
1507 Bill Owens Parkway  
Longview, Texas 75604  
Telephone: 903-757-6400  
andrea@millerfairhenry.com

**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel for the parties conferred to discuss the substance of this Motion pursuant to Local Rule CV-7(h). Counsel for the parties agreed on the substance of this Motion and further agreed to jointly file this Motion.

/s/ Katherine Q. Dominguez  
Katherine Q. Dominguez

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 28th day of January, 2025.

/s/ Katherine Q. Dominguez  
Katherine Q. Dominguez